

UNITED STATES DISTRICT COURT

for the

Middle District of Pennsylvania

GOVERNMENT
EXHIBIT

3

United States of America

v.

Richard Little

Case No. 1:24-mj-00051

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 21, 2024 in the county of Franklin, PA in the
Middle District of Pennsylvania, the defendant(s) violated:

Code Section
 18 USC 875 (c); 18 U.S.C.
 922(g)(3)

Offense Description
 Interstate Communications/Threats; Unlawful Poss. of Firearm by Unlawful User of
 Controlled Substance

This criminal complaint is based on these facts:

I, Brenda McDermott, a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, being duly sworn, depose and state:

☒ Continued on the attached sheet.Brenda McDermott

Complainant's signature

SA Brenda McDermott, ATF

Printed name and title

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF
 Sworn to before me and signed in my presence. FED. R. CRIM. P. 4.1 BY TELEPHONE.

Date: 06/21/2024Daryl F. Bloom

Judge's signature

City and state: Harrisburg, PA

Honorable Daryl Bloom

Printed name and title

CONTINUATION PAGES FOR CRIMINAL COMPLAINT

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been since so employed since December 2018. I am a graduate of the Federal Law Enforcement Training Center and ATF National Academy. I obtained a Bachelor's degree in Criminal Justice from Temple University in Philadelphia, Pennsylvania. Before joining ATF, I was employed for one year with the SEPTA Transit Police Department in Philadelphia, Pennsylvania, where I was assigned to the patrol division.

2. I am currently assigned to the ATF Philadelphia Field Division, Harrisburg Field Office, comprised of ATF Special Agents whose primary responsibilities include investigating individuals or groups who have committed violations of the federal firearms, explosives, and narcotic laws.

3. The facts herein are based on, among other things: my training and experience in conducting criminal investigations; my personal knowledge; my review of documents and other evidence, including Facebook posts and videos; public records; and conversations with other law enforcement agents and officers.

4. The facts herein are for the limited purpose of establishing probable cause in support of the criminal complaint. I do not attempt to set forth all details or facts surrounding the investigation.

5. Based on the facts herein, there is probable cause to believe that violations of 18 U.S.C. § 875(c) (Interstate Communications / Threats) and 18 U.S.C. § 922(g)(3) (Unlawful Possession of Firearm by Unlawful User of Controlled Substance) have been committed by Richard LITTLE.

6. On or about June 17, 2024, the Pennsylvania State Police (PSP) and Franklin County Sherriff's Office informed the ATF of social media posts by Richard LITTLE on his Facebook account, "Rich Little."

7. Facebook is a free-access social networking website that can be accessed at <http://www.facebook.com>. Facebook users can use their accounts to share or post communications, news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

8. The PSP was familiar with LITTLE from an incident on or about April 4, 2024, at the Franklin County Veteran Affairs Human Resource Building, in Chambersburg, Pennsylvania. LITTLE became aggressive toward the VA Director and made the following comments: (i) “I’m going to end you mother fucker”; (ii) “get that mother fucking cock sucker [Franklin County Commissioner Dean] Horst down here now so I can end him too”; and (iii) “you better watch out you piece of shit.”

9. Law enforcement believed the social media posts were triggered by an eviction notice that LITTLE received on or about June 10, 2024.

10. PSP notified the ATF due to the threatening nature of the posts and the direct threats being made to Pennsylvania Senator Doug Mastriano, Franklin County Commissioner Dean Horst, and United States Army Sgt. Major Sean Livolsi.

11. ATF reviewed LITTLE’s Facebook page, an open-source social media page, and observed the following.

12. On or about June 10, 2024, at approximately 10:43 a.m., LITTLE posted a photograph of a firearm, more specifically the firing

pin of the firearm, with a caption of “Nobody around here wants to enforce federal law? Kill switch engaged. Come evict me. I’m ready.”

13. On or about June 10, 2024, at approximately 10:48 a.m., LITTLE posted two photographs of a handgun, bearing S/N: G000037, with the caption of “The day I bought her so many years ago I knew, I knew there would come a day she and I would have our time together, Added a 3 ozs to her and she shoots like a 9mm now, no jump nothing, just 3 beautiful taps of 45 Acp, no sight adjustment, just straight laser fire, I love this weapon.”

14. ATF conducted a query of the firearm’s serial number and determined that LITTLE purchased a pistol bearing S/N: G000037 on September 1, 2010, from Hoover’s Outfitting located at 2099 Garrett Road, Rockwood, Pennsylvania.

15. ATF conducted a firearms query through law enforcement databases which indicated LITTLE has purchased and currently is the registered owner of multiple firearms. In addition, LITTLE has an active concealed carry permit in Franklin County that allows LITTLE to conceal carry firearms on his person and inside a vehicle.

16. On or about June 10, 2024, at approximately 11:00 a.m., LITTLE posted a photograph of a AR-style pistol, with the caption of “It’s time.....Mike Gregory, can ya get my 45-70 back to me in working order soon? If imma engage county tyrants, I wanna use a federal round, Irony, I love it (smiling emoji).”

17. On or about June 10, 2024, at approximately 11:05 a.m., LITTLE posted a video on his Facebook page, with the caption “I’m done (tagging PA Senator Doug Mastriano) You and your bullshit created this, don’t you fucking forget it. Come get me Sean, you fucking pussy. Come get me.” Moreover, in the video:

- a. LITTLE states in the beginning, “I just want you to know Sean Livolsi . . . This is the fucking war you wanted you piece of shit. . . . this ain’t half of it . . . I just started . . . as you can see I’ve been waiting for this day for two year. I’ve been doing nothing but planning this fucking day.” LITTLE makes these statements while displaying multiple firearms on his bed, and numerous boxes of ammunition on the floor of his bedroom.

- b. LITTLE moves throughout his apartment while videotaping. LITTLE moves to the living room area, where more firearms are displayed on top of the couch. A small section of the couch is seen propped up on its side that would allow an individual to hide behind. LITTLE moves into the kitchen area, where more firearms are displayed, and he described “kill zones” while looking out the rear window. LITTLE picks up an AR-style pistol from the kitchen counter and refers to it as “my little buddy”. LITTLE states “I’ve been waiting for this day for a while Sean Livoli”.

18. On or about June 10, 2024, at approximately 11:35 a.m., LITTLE posted a video on his Facebook page.

- a. LITTLE moves throughout his apartment while multiple firearms are on display. LITTLE expresses his frustration with the federal government and continues to express his anger towards Sean Livolsi. LITTLE states, “I’ve had two years to think about this and plan for it Sean . . . first what we got here is a nice little 500

/ .50 caliber.” LITTLE picks up the revolver from the couch and points the camera at the front door. LITTLE states, “your boys if they make it . . . guaranteed they’re shit ain’t gonna stop the 500 at about 2-3 feet . . . and then after I unload that what your gonna have is the door buster . . . that bullet is going to rip through them and spray blood through the boys (LITTLE simulates firing rounds verbally).”

- b. LITTLE then moves back to the kitchen area and picks up what appears to be an AR-style 9mm pistol. LITTLE states “it will be waiting...I made that bad boy...not fully automatic as you can see (LITTLE manipulates the selector switch)... that mother fucker shoots straight lasers at night.” LITTLE then picks up another rifle which he calls “the Trumper”. LITTLE describes another “kill zone” while holding the firearm and points the camera out the kitchen side window. LITTLE states “take out the engine block with that wonderful Donald Trumper (referencing the firearm).”

- c. LITTLE moves to the rear of the apartment and states, “you can also see Sean, look at beautiful kill zone, bring your fucken vehicles cause if that’s how you want to play it . . . I’ll kill your vehicles . . . and look what I have waiting...of course I got the 9mm.”
- d. LITTLE picks up another firearm from the kitchen table which appears to be an AR-style pistol. LITTLE states “come on Sean . . . Sean . . . if I’m going down in blaze of glory . . . baby come on.” LITTLE pulls the magazine from the pistol and shows the magazine is loaded and references the ammunition to a “.357 hunting round.” LITTLE states, “that mother fucker will rip through anything you got . . . up to “Class 3, I believe . . . especially here . . . I take out your vehicles and I’m just going to be sitting here popping you mother fuckers (LITTLE simulates firing rounds verbally).”
- e. LITTLE picks up a handgun from the kitchen table and references it as a “desert eagle.” LITTLE expresses

that he is in possession of “special bullets” and refers to hollow point ammunition that is used by law enforcement and then goes on to state “your Class 2 don’t mean shit to me . . . so I suggest you boys get ready”.

- f. At the end of the video, LITTLE states, “as you can see . . . I’ve been waiting for this mother fucking day buddy . . . Part 2 bitch . . . I guarantee I’ll kill your squad of yours as well but this time we ain’t training mother fucker . . . See you soon bitch.”

19. On or about June 21, 2024, at approximately 7:30 a.m., LITTLE posted on his Facebook page, “(tagging Senator Doug Mastriano) You ruin one more person I will wear your fucking flesh. You are done you piece of shit, leave now or don’t. But you will leave today. Or you will not be found Monday Senator. Make your fucking choice.”

20. On the same day, approximately one hour later, LITTLE posted on his Facebook page a video. During the video he states “I got to see my wife yesterday . . . Baby girl is so fucked up she pulled all her eye lashes out . . . and you mother fuckers think there ain’t gonna be

blood (LITTLE starts laughing) . . . I'm gonna god damn pull everything off you mother fuckers (LITTLE starts laughing again) . . . and I'm gonna give it to baby girl as a present . . . You fucked up boy . . . you fucked up."

21. As described above, LITTLE posted multiple photographs, videos, and comments displaying multiple firearms. More specifically, LITTLE physically picked up the firearms and described in detail the type of caliber and potential damage that can occur when fired at individuals wearing different class types of body armor. LITTLE describes "his plan" on what will happen to the individuals who try to evict him and even simulates firing a firearm verbally in multiple videos.

22. Additionally, in at least one of the videos, LITTLE admits smoking marijuana and shows marijuana inside his residence. In the same video, firearms and drug paraphernalia can be seen.